

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

No. 1:05:CR:209-1

Plaintiff,

HON. R. ALLAN EDGAR

v.

SHAWN W. LAEMMRICH,

Defendant.

_____/

GOVERNMENT'S MOTION FOR DOWNWARD
DEPARTURE BASED UPON SUBSTANTIAL ASSISTANCE

The United States of America, by and through its attorneys, Margaret M. Chiara, United States Attorney for the Western District of Michigan, Richard S. Murray, Assistant United States Attorney, and Eric J. Klumb, Senior Counsel, United States Department of Justice, moves for a four-level downward departure from Defendant Shawn Laemmrich's final guideline range as computed by the Court, pursuant to USSG §5K1.1. This departure request is based upon Defendant Laemmrich's substantial assistance to the United States as described and more fully set forth in the accompanying brief.

Respectfully submitted,

MARGARET M. CHIARA
United States Attorney

Dated: June 16, 2006

/s/ Richard S. Murray

RICHARD S. MURRAY
Assistant United States Attorney
ERIC J. KLUMB
Senior Counsel
Computer Crime and Intellectual Property Section
United States Department of Justice